

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

**FEMHEALTH USA, INC., d/b/a
CARAFEM,**

Plaintiff,

v.

**RICKEY NELSON WILLIAMS, JR.;
BEVELYN Z. WILLIAMS, JR.;
EDMEE CHAVANNES; OPERATION
SAVE AMERICA; JASON STORMS;
CHESTER GALLAGHER; MATTHEW
BROCK; COLEMAN BOYD; FRANK
LINAM; BRENT BUCKLEY; and AJ
HURLEY;**

Defendants.

**Civil Action No. 3:22-cv-00565
JUDGE CAMPBELL**

DECLARATION OF MELISSA GRANT

I, Melissa Grant, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.
2. At all times relevant hereto, I have served as the Chief Operations Officer for FemHealth USA, Inc. d/b/a carafem (“carafem”).
3. I am also one of the co-founders of carafem and have been with the organization since its inception in October 2013. Since that time, I have lead carafem’s business operations, strategy, and growth initiatives.
4. Carafem has always been dedicated to providing individuals with safe access to reproductive healthcare. Among other services, our clinics provide clients with counseling and

access to birth control options, testing for urinary, vaginal, and sexually transmitted infections and, as permitted by state law, access to abortion care.

5. Since the Supreme Court's decision in *Dobbs*, carafem has been closely monitoring the varying state legislative requirements for and restrictions on abortion care across the country and tailoring our operations to comply with state law. Our operations in Tennessee have been no exception.

6. Tennessee, among other states, has already greatly restricted access to abortion care, with additional restrictions set to take place when the state's so-called "trigger ban" goes into effect on August 25, 2022.

7. However, reproductive healthcare needs do not end with the enactment of these new laws, and nor will carafem's core mission to provide clients with safe and approachable reproductive care.

8. While carafem will continue to modify its abortion-related services in Tennessee in accordance with state law, carafem clinics will continue to operate, providing clients with access to and information regarding birth control methods, testing for infections, pregnancy testing, and other family planning services.

9. Unfortunately, we fear that opponents of abortion rights will continue to target carafem clinics in Tennessee, even after August 25, 2022, and even as we operate in compliance with the changing laws.

10. Our concern is well-founded based on the threats and intimidation our Mount Juliet clinic already experienced at the end of July 2022, even as our clinic was operating in compliance with Tennessee's interim abortion restrictions in place after the *Dobbs* decision and prior to the enactment of the trigger law on August 25, 2022. We also understand that these same protestors

have targeted, blockaded, and intimidated other healthcare providers who no longer perform abortion services.

I provide the foregoing Declaration pursuant to 28 U.S.C. § 1746 and penalty of perjury.

Dated: August 9, 2022

A handwritten signature in black ink, appearing to read "M Grant", is positioned above a horizontal line.

Melissa Grant

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing will be served this 9th day of August, 2022 via Federal Express, on the defendants identified below:

Via Federal Express

Aaron J. Hurley
2526 5th St.
Santa Monica, CA 90405

Via Federal Express

Brent Buckley
516 S. Main St.
Topeka, IN 46571

Via Federal Express

Chester “Chet” Gallagher
1145 Holloway Road
Lebanon, TN 37090

Via Federal Express

Coleman Boyd
1635 North Davis Road
Bolton, MS 39041

Via Federal Express

Edmee Chavannes
9100 Integra Preserve Ct., #316
Ooltewah, TN 37363

Via Federal Express

Bevelyn Z. Williams
9100 Integra Preserve Ct., #316
Ooltewah, TN 37363

Via Federal Express

Frank “Bo” Linam
195 Spring Creek Lane
Lebanon, TN 37090

Via Federal Express

Jason Storms
955 County Road C
Grafton, WI 53024

Via Federal Express

Matthew Brock
14 Anderson St.
Inman, SC 29349

Via Federal Express

Operation Save America National, Inc.
c/o Frank Campana, Registered Agent
847 Remsen Ave NW
Palm Bay, FL 32907

Via Federal Express

Rickey Nelson Williams, Jr.
9100 Integra Preserve Ct., #316
Ooltewah, TN 37363

/s/ Sarah B. Miller